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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

OMAR ARNOLDO RIVERA
MARTINEZ; ISAAC ANTONIO
LOPEZ CASTILLO; JOSUE
VLADIMIR CORTEZ DIAZ; JOSUE
MATEO LEMUS CAMPOS;
MARVIN JOSUE GRANDE
RODRIGUEZ; ALEXANDER
ANTONIO BURGOS MEJIA; LUIS
PEÑA GARCIA; JULIO CESAR
BARAHONA CORNEJO, as
individuals,

Plaintiffs,

v.

The GEO Group, Inc., a Florida
corporation; the City of Adelanto, a
municipal entity; GEO Lieutenant Diaz,
sued in her individual capacity; GEO
Sergeant Campos, sued in his individual
capacity; Sarah Jones, sued in her
individual capacity; The United States
of America; Correct Care Solutions,
Inc.; and DOES 1-10, individuals;

Defendants.

Case No. 5:18-cv-01125-SP

**PLAINTIFFS' PROPOSED
STATEMENT OF THE CASE**

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1 PLEASE TAKE NOTICE that Plaintiffs, by and through their counsel of
2 record, hereby submit the following proposed Statement of the Case. The parties
3 conferred in an attempt to reach agreement on a Joint Statement of the Case but
4 were unable to do so.

5 Dated: January 14, 2020

6 LAW OFFICE OF RACHEL STEINBACK
7 LAW OFFICES OF CAROL A SOBEL
8 SCHONBRUN SEPLOW HARRIS
& HOFFMAN LLP
9 LAW OFFICE OF COLLEEN FLYNN
LAW OFFICE OF MATTHEW STRUGAR

10 By: /s/ Rachel Steinback
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JOINT STATEMENT OF THE CASE

This case is a civil rights action in which the Plaintiffs allege that the Defendants violated their rights under the Constitution and under California law.

Plaintiffs are eight young men who came to the United States from El Salvador and Honduras in 2017 seeking asylum. Plaintiffs were detained at the Adelanto Detention Facility, an immigration detention facility run by a corporation called The GEO Group, Inc. The Defendants in this action are The GEO Group, Inc., and two of its employees, GEO Lieutenant Jane Diaz and GEO Sergeant Giovanni Campos.

The incident at issue took place on June 12, 2017. Plaintiffs allege that on that date, they sat at two tables in their housing dorm at Adelanto and announced that they were beginning a peaceful hunger strike to call attention to the conditions of their confinement. Plaintiffs contend that GEO Group officers responded with an unjustified use of force which included pepper spraying them, physically assaulting them, forcing them into hot showers, and housing them in segregation for ten days. Defendants deny any misconduct and allege they reasonably used pepper spray after Plaintiffs refused orders to return to their beds to be counted. Defendants deny they violated any of Plaintiffs' rights.

At the conclusion of this trial, the parties will ask you to determine whether the Defendants' use of force was appropriate or whether the Plaintiffs should be compensated for violations of their rights.